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*Interim Co-Lead Advertiser Class Counsel*

*Interim Co-Lead Advertiser Class Counsel*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF AMANDA F.  
LAWRENCE IN SUPPORT OF  
ADVERTISER PLAINTIFFS' MOTION  
FOR ADMINISTRATIVE RELIEF  
PURSUANT TO RULE 7-11 REGARDING  
SUBSTITUTION OF CO-LEAD  
COUNSEL**

1 I, Amanda Lawrence, declare as follows:

2 1. I am an attorney duly licensed and authorized to practice law before this Court. I am  
3 a partner in the law firm Scott+Scott Attorneys at Law LLP, counsel for Plaintiffs Affilious, Inc.,  
4 Jessyca Frederick, Mark Young, Joshua Jeon, 406 Property Services, PLLC, Mark Berney, and  
5 Katherine Looper (“Advertiser Plaintiffs”) in the above matter. I make this declaration based on  
6 my personal knowledge in support of Advertiser Plaintiffs’ Motion for Administrative Relief  
7 Pursuant to Local Rule 7-11 Regarding Substitution of Co-Lead Counsel (“Motion”). If called upon  
8 to do so, I could and would personally and competently testify to the following facts.

9 2. On March 18, 2021, the Court issued an Order Appointing Interim Class Counsel  
10 and Plaintiffs’ Executive Committees (“Order”) (Dkt. No. 73), appointing Kristen Anderson of  
11 Scott+Scott and Yavar Bathaee of Bathaee Dunne LLP as interim co-lead counsel and Tina Wolfson  
12 of Ahdoot & Wolfson, PC and Keith J. Verrier of Levin Sedran & Berman LLP as executive  
13 committee counsel for the Advertiser Class in this matter.

14 3. Since the Order, in addition to Ms. Anderson, the following Scott+Scott attorneys  
15 have principally worked on this litigation: Christopher Burke, Patrick McGahan, Michael Srodoski,  
16 Hal Cunningham, and Daniel Brockwell.

17 4. I am a partner engaged in complex antitrust, securities, corporate governance,  
18 consumer, and litigation matters. I was named interim co-lead class counsel in *In re: GSE Bonds*  
19 *Antitrust Litig.*, No. 1:19-cv-01704-JSR (S.D.N.Y.) before Judge Rakoff, which resulted in  
20 settlements totaling \$386.5 million. I am also intricately involved in the *In re Cattle and Beef*  
21 *Antitrust Litigation*, 0:20-cv-01319-JRT (D. Minn.) before Chief Judge Tunheim, where  
22 Scott+Scott Attorneys at Law LLP has been named interim co-lead counsel for the *Cattle*  
23 plaintiffs. I was intricately involved in the “ISDAfix” case (*Alaska Electrical Pension Fund v.*  
24 *Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y.)), taking depositions and working  
25 through expert discovery, including numerous *Daubert* motions and responses. I helped achieve a  
26 settlement in *Vulcan Society, Inc. v. The City of New York*, 07-CV-2067 (E.D.N.Y.), that brought  
27 both monetary and injunctive relief to a class of African American and Hispanic firefighters in  
28 New York City, as well as a settlement in *In re Prudential Insurance Company of America*

1 *SGLI/VGLI Contract Litigation*, 3:11-md-02208-MAP (D. Mass.) that brought both forms of relief  
 2 to relatives of deceased servicemen and women. I am a graduate of Dartmouth College and Yale  
 3 Law School and am involved in numerous panels for women in the law.

4 5. Scott+Scott is an international plaintiffs' litigation law firm with over 100 attorneys  
 5 in offices spanning from San Diego to New York and also in Europe (Amsterdam, Berlin, and  
 6 London). Between 2009-2019, when in lead counsel positions, Scott+Scott recovered  
 7 \$3,472,275,000 in antitrust class action settlements, earning the firm the number two rank in  
 8 recoveries by an individual firm during the last decade. Scott+Scott also held the number two rank  
 9 for settlements as lead counsel between 2013-2018.<sup>1</sup> Scott+Scott's recoveries in lead counsel roles  
 10 include:

11 *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 13-cv-7789 (LGS)  
 12 (S.D.N.Y.) ("FX"). Scott+Scott serves as co-lead counsel in this antitrust class action that alleges  
 13 major banks and financial institutions conspired to fix the prices of foreign exchange transactions.  
 14 The firm obtained final approval of settlements with 15 of the 16 defendants, totaling over  
 15 \$2.3 billion, and continues to litigate against the remaining defendant. Renowned mediator, Kenneth  
 16 R. Feinberg, concluded that the FX settlements "represent[] some of the finest lawyering toward a  
 17 negotiated resolution that I have witnessed in my career" and that co-lead counsel were "superlative,  
 18 sophisticated, and determined plaintiff's lawyers." *See FX*, ECF No. 926, ¶29.

19 *Alaska Electrical Pension Fund v. Bank of America, N.A.*, No. 14-cv-7126 (JMF)  
 20 (S.D.N.Y.) ("ISDAfix"). Scott+Scott served as co-lead counsel in this antitrust class action that  
 21 alleged 14 major banks and a broker conspired to manipulate the ISDAfix rate, a key benchmark  
 22 interest rate for a broad range of interest rate derivatives and other financial instruments. The Court  
 23 approved \$504 million in class settlements. Judge Furman praised co-lead counsel as having done  
 24 "an extraordinary job" in "probably the most complicated case" he has had. *ISDAfix*, ECF No. 743

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 26 <sup>1</sup> Davis, Josh Paul and Kohles, Rose, 2019 Antitrust Annual Report: Class Action Filings in  
 27 Federal Court, at 31 (August 2020) (available at <https://ssrn.com/abstract=3696575>) (last accessed  
 28 March 5, 2021); Davis, Josh Paul and Kohles, Rose, 2018 Antitrust Annual Report: Class Action  
 Filings in Federal Court, at 27 (May 1, 2019) (available at <https://ssrn.com/abstract=3386424>) (last  
 accessed March 5, 2021).

1 at 27:14-28:6 (S.D.N.Y. Nov. 8, 2018). Judge Furman further elaborated, “I cannot really imagine  
 2 how complicated it would have been if I didn’t have counsel who had done as admirable job in  
 3 briefing it and arguing as you have done. You have in my view done an extraordinary service to the  
 4 class.” *Id.*

5 ***Dahl v. Bain Capital Partners, LLC***, No. 07-cv-12388 (WGY) (D. Mass.) (“*Dahl*”).  
 6 Scott+Scott served as co-lead counsel in this antitrust class action that alleged private equity firms  
 7 colluded to restrain competition and depress prices paid to shareholders of public companies in  
 8 connection with leveraged buyouts. Although the DOJ declined to prosecute, the case recovered  
 9 \$590.5 million in settlements on behalf of the class.

10 ***In re GSE Bonds Antitrust Litig.***, No. 19-cv-1704 (JSR) (S.D.N.Y.) (“*GSE*”). Scott+Scott  
 11 served as co-lead counsel in this case brought against 16 major banks and financial institutions,  
 12 alleging a conspiracy to fix the prices of government sponsored entity bonds. In approving \$386.5  
 13 million settlements, Judge Rackoff noted the “high quality of plaintiffs’ counsel’s work, both in  
 14 briefs and oral argument. Moreover, counsel’s achievement in ‘obtaining valuable recompense and  
 15 forward-looking protections for its clients is particularly noteworthy given the caliber and vigor of  
 16 its adversaries.’” *GSE*, ECF No. 430, slip op. at 13 (S.D.N.Y. June 16, 2020).

17 I declare under penalty of perjury under the laws of the United States of America that the  
 18 foregoing is true and correct.

19 Executed on this 8th day of August 2022, in Colchester, Connecticut.

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 22 AMANDA F. LAWRENCE  
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